

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:	:	Chapter 13
RAMON VAUGHAN,	:	Case No. 5:18-bk-04764-JJT
Debtor,	:	

FRANKLIN MINT FEDERAL CREDIT UNION,	:
Movant,	:
	:
v.	:
RAMON VAUGHAN,	:
Respondent	:

**ANSWER TO MOTION OF FRANKLIN MINT FEDERAL CREDIT
UNION FOR AN ORDER VACATING THE AUTOMATIC STAY
UNDER 11 U.S.C. § 362(d) AND A WAIVER OF THE FOURTEEN DAY STAY
ON BEHALF OF DEBTOR, RAMON VAUGHAN**

AND NOW COMES Debtor, Ramon Vaughan, by and through his attorneys, and in Answer to the Motion of Franklin Mint Federal Credit Union for an Order Vacating the Automatic Stay and a Waiver of the Fourteen Day Stay avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor maintains he is current with postpetition loan payments.
7. Denied. Debtor is not in arrears with postpetition payments.
8. Admitted.
9. Admitted as to the content of the Bankruptcy Code.
10. Admitted as to the content of the Bankruptcy Code.
11. Admitted as to the content of the Bankruptcy Code.

12. Denied. Debtor maintains he is current with postpetition loan payments.
13. Denied. Debtor maintains he is current with postpetition loan payments.
14. Denied that relief from stay is warranted.
15. Denied. Proof is demanded.
16. Denied. Proof is demanded.
17. Denied.

WHEREFORE, Debtors, Ramon Vaughan, respectfully pray this Honorable Court for an Order that the Motion of Franklin Mint Federal Credit Union for an Order Vacating the Automatic Stay Under 11 U.S.C. § 362(d) and a Waiver of the Fourteen Day Stay of Such Order Without Concurrence be denied and for such other and further relief as the Honorable Court deems just and appropriate.

**NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.**

By: /s/ Robert J. Kidwell
Robert J. Kidwell, Esquire
Attorney for Debtors
PO Box 511, 712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
rkidwell@newmanwilliams.com

In re: : Chapter 13
RAMON VAUGHAN, : Case No. 5:18-bk-04764-JJT
Debtor, :

V.

Case 5:18-bk-04764-JJT Doc 29 Filed 02/05/19 Entered 02/05/19 17:30:41 Desc
Main Document Page 3 of 3